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December 16, 2016

Via ECF
The Honorable Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **United States v. Blaise Caroleo, 16-MJ-911**
Second Application to Modify Bail Conditions

Your Honor:

I respectfully write to request an Order for a Modification of Bond Conditions. Mr. Caroleo currently is released pursuant to bond that restricts the inhabitants of his home to him and his wife. Mr. Caroleo's son, Nicholas Joseph Caroleo is of adult age and able to help with the bills for the family home as Mr. Caroleo and his wife are struggling at the present time if he is allowed to reside there. I have consulted with Pretrial and Government concerning this issue. Pretrial takes no position. The government will consent so long as Mr. Nicholas Joseph Caroleo agrees to the conditions of not allowing Mr. Blaise Caroleo to have interaction with his grandson and use of the internet. Mr. Nicholas Joseph Caroleo has signed a declaration attached to this request to that effect which has been reviewed by the government. I respectfully request a modification of bail conditions such that Mr. Nicholas Joseph Caroleo may reside at Mr. Blaise Caroleo's residence at 224 Wild Avenue, Staten Island, NY 10314.

Respectfully Submitted,

/s/
Michael Brown II
Attorney for Mr. Caroleo
Assistant Federal Defender
(718) 407-7408

cc: Clerk of the Court (RML) (by ECF) (Delivery)
AUSA Erin Argo
Blaise Caroleo, (via mail)

Enclosure: Notarized Signed Letter by Nicholas Joseph Caroleo

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
---X
UNITED STATES OF AMERICA

-against-

DECLARATION

BLAISE CAROLEO:

16-MJ-911

Defendant.
---X

I, NICHOLAS JOSEPH CAROLEO, declare, that the following is true and correct:

1) I have been made aware of the bond conditions of my father, Blaise Caroleo.

2) I have, and will continue to have, a password on my mobile device and other electronics that have internet access and will not provide such passwords to Blaise Caroleo.

3) I will only visit my son outside of Blaise Caroleo's residence and outside of Blaise Caroleo's presence.

DATED: BROOKLYN, N.Y.
December 12th, 2016

[signature]

Nicholas Joseph Caroleo

Sworn to me this 12th day of December, 2016

BRYAN PAYTON
Notary Public, State of New York
No. 01PA6342438
Qualified in Kings County
Commission Expires May 23, 2020

[signature]